



*Fresh produce from our families to yours.*

June 27, 2005

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David.Priester@usda.gov

Mr. David L. Priester  
Standardization Section  
Fresh Products Branch  
Fruit & Vegetable Programs  
Agricultural Marketing Service  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Room 1661 South Building, Stop 0240  
Washington, D.C. 20250-0240

Dear Mr. Priester:

**Re: United States Standards for Grades of Globe Artichokes  
Docket #FV-05-305**

Western Growers is an agricultural trade association whose 3,000 members grow, pack and ship 90% of the fresh vegetables and nearly 70% of the fresh fruits and nuts grown in Arizona and California, which accounts for over one half of our nation's fresh produce production.

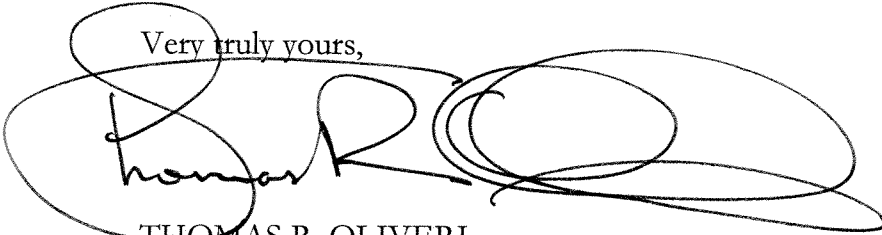
It is on behalf of those members that I am submitting these comments after completing a survey with Western Growers globe artichoke growers, shippers and packers it has been determined that they are interested in reviewing and possibly revising the U.S. Grade Standards for Globe Artichokes. The following issues specifically were raised concerning possible changes or revisions of the U.S. Standards for Grade of Globe Artichokes.

- §51.3789 Properly Trimmed.
  - a. The market place now calls for “long stem” artichokes with stem lengths of 8 to 10 inches. The current definition does not allow for longer stems. The standard cut stem is from 1 to 2.75 inches depending on the size of the artichokes. Therefore we are seeking the review of longer stem lengths for U.S. 1 and No. 2 grades.
- §51.3791 Fairly Compact
  - a. What does “spread slightly” mean. During the summer months the artichokes will tend to spread quickly in warmer weather. There is a direct correlation between achieving size and having some spread of the brackets. Measuring from the tip of the bracket to the body of the artichoke does not exceed 1”.

- §51.3793 Damage
  - a. During the winter, artichokes may become blistered by frost. How are frosted artichokes graded under the current guidelines? Frost can be white in appearance at the on-set but can turn brown over time, especially if exposed to wet conditions. Therefore, there may be gradients of “damage” over time. Can frosted artichokes pass for U.S. No. 1? Or would they make a U.S. No. 2?

The above are a few of the comments our Globe Artichoke growers, shippers and packers made concerning possible changes. Western Growers would be more than happy to be a major participant in any revisions of the standard by discussing and surveying its membership that grows, ships and packs Globe Artichokes on specific issues.

Very truly yours,

A large, stylized handwritten signature in black ink, appearing to read 'Thomas R. Oliveri', written over the 'Very truly yours,' text.

THOMAS R. OLIVERI  
Director, Trade Practices & Commodity Services

C: Leanne L. Skelton - [leanne.skelton@usda.gov](mailto:leanne.skelton@usda.gov)